

**TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.**

ATTORNEYS AT LAW

40 EXCHANGE PLACE

18TH FLOOR

NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE

(212) 482-1303 FAX

WWW.TALKINLAW.COM

EMAIL: INFO@TALKINLAW.COM

**MEMO ENDORSED**

MARYLAND OFFICE:  
5100 DORSEY HALL DRIVE  
SUITE 100  
ELLIOTT CITY, MD 21042

410-964-0300

NEW JERSEY OFFICE:  
2500 PLAZA 5  
HARBORSIDE FINANCIAL CENTER  
JERSEY CITY, NJ 07311

201-342-6665

November 20, 2023

Application GRANTED. The initial conference scheduled for November 30, 2023 is ADJOURNED to February 29, 2023 at 11:00 a.m. in Courtroom 20C, 500 Pearl Street, New York, New York. The Court finds that the ends of justice served by excluding the time between November 30, 2023 and February 29, 2024, outweigh the best interests of the public and the Defendant in a speedy trial as provided in 18 U.S.C. § 3161(h)(7)(A) because, among other things, the parties are presently engaged in discussions regarding a potential disposition of this matter and the exclusion would allow for those discussions to continue. It is hereby ORDERED that the time between November 30, 2023 and February 29, 2024, is excluded.

Dated: November 21, 2023  
New York, New York

SO ORDERED.

  
JESSICA G. L. CLARKE  
United States District Judge

Re: United States v. Joseph Malvasio & Gregg Marcus  
23 Cr. 396 (JGLC)

Dear Judge Clarke:

A conference in the above referenced case is currently scheduled for November 30, 2023. Defendants Joseph Malvasio and Gregg Marcus (the “defense”) have begun reviewing the voluminous discovery in this case. However, efficient review of the terabytes of information disclosed by the government also requires the retention of a discovery review vendor. The defense has identified a vendor and the discovery will be loaded on a review platform in the immediate near future. The defense anticipates a period of at least ninety days from the scheduled conference will be necessary for enough discovery review to be completed to be in a position to inform the Court whether pretrial motions will be filed in this case. For this reason, the defense respectfully requests an adjournment to a date convenient to the Court that is approximately ninety past November 30, 2023 to allow for this discovery review.

The government, by Assistant United States Attorney Jaclyn Delligatti, consents to this application and the defense consents to the period of time of the requested adjournment being excluded from Speedy Trial Act, 18 U.S.C § 3161, calculation. Thank you for Your Honor’s consideration of this request.

Very truly yours,  
*Sanford Talkin*  
Sanford Talkin

cc: AUSA Jaclyn Delligatti (by ECF)  
All counsel (by ECF)